

KASOWITZ BENSON TORRES LLP

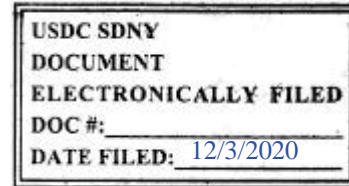
MARISSA E. MILLER
DIRECT DIAL: (212) 506-1832
DIRECT FAX: (212) 835-5226
MEMILLER@KASOWITZ.COM

1633 BROADWAY
NEW YORK, NEW YORK 10019
(212) 506-1700
FAX: (212) 506-1800

ATLANTA
HOUSTON
LOS ANGELES
MIAMI
NEWARK
SAN FRANCISCO
SILICON VALLEY
WASHINGTON DC

December 1, 2020

Honorable Alison J. Nathan
United States Courthouse
40 Foley Square Courtroom 906
New York, NY 10007



Re: United States v. John Geraci 18-CR-00715

Dear: Judge Nathan

We file this letter to respectfully request a six-week continuance of the December 4, 2020, surrender date for Mr. John Geraci to January 15, 2021, to allow Mr. Geraci to obtain treatment for his ongoing medical issues. This Court previously granted a continuance of Mr. Geraci's surrender date from March 23, 2020, to May 1, 2020, from May 1, 2020, to July 1, 2020, from July 1, 2020, to September 1, 2020, from September 1, 2020, to September 4, 2020, from September 4, 2020, to October 5, 2020 and from October 5, 2020 to December 4, 2020. See Dkt. Nos. 78, 80, 82, 84, 86, 88.

As discussed in our August 31, 2020 letter (Dkt. 83) Mr. Geraci was released from the hospital on August 30, with orders to see a neurology specialist as soon as possible for further diagnoses and treatment. On September 3, Mr. Geraci was given an order to get an MRI brain scan without contrast for diagnostic purposes. However, the referring physician was not able to conduct the test at that time. Instead, Mr. Geraci was instructed to schedule a later appointment to have the test. Mr. Geraci subsequently had the MRI scheduled a follow up appointment with the neurologist. The follow up appointment occurred on September 24, 2020. At that time, upon review of the MRI, the neurologist observed that the results were abnormal and instructed Mr. Geraci to schedule an appointment with a Neurosurgeon to discuss the possibility of surgery.

Mr. Geraci subsequently saw the neurosurgeon on October 8, 2020. At that time, he was directed to yet another specialist for yet another follow up appointment. (See Ex. A.) On December 1, 2020, Mr. Geraci saw an orthopedic specialist, who diagnosed him with impingement syndrome, supraspinatus tendinitis, subacromial bursitis, and biceps tendonitis in his left shoulder. In order to appropriately treat these issues Mr. Geraci needs to attend physical therapy for two to three times a week for the next four to six weeks. (See Exs. B, C.) Further, Mr. Geraci has a stroke follow up appointment with the Neurologist on December 3, 2020, to continue treatment for the TIA he suffered earlier this year. (See Ex. D.)

KASOWITZ BENSON TORRES LLP

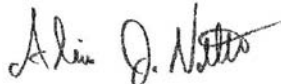
Honorable Alison J. Nathan
December 1, 2020
Page 2

While Mr. Geraci understands the Court has already granted several extensions, prior to today Mr. Geraci had not received a diagnosis for this most recent ailment. He has had to schedule appointments with three different specialists, which has been very difficult in the current global health crisis. With today's diagnosis, Mr. Geraci is hopeful that this continuance will allow him to receive treatment and finally recover from this issue.

Counsel for Mr. Geraci has conferred with Mr. Skinner and Mr. Lenow, AUSAs on this matter and they have consented to Mr. Geraci's request for this temporary delay of his surrender date to January 15, 2021.

For the above-stated reasons, Counsel for Mr. Geraci respectfully requests a continuation of Mr. Geraci's surrender date from **December 4, 2020 to January 15, 2021.**

SO ORDERED


12/2/2020

Sincerely,
Marissa E. Miller

/s/ Marissa E. Miller
Lyn R. Agre

/s/ Lyn R. Agre
Counsel for John Geraci